



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**MAR 30 2006**

Anthony Labreglio  
Director of Fiscal Services  
The City of Yonkers Department of Planning and Development  
87 Nepperhan Avenue  
Suite 312  
Yonkers, New York 10701-3872

Dear Mr. Labreglio:

The Environmental Protection Agency (EPA) has reviewed the final environmental impact statement (FEIS) for the Ashburton Avenue Master Plan and Urban Renewal Plan/Mulford Gardens Hope VI Revitalization Plan (CEQ# 20060060). This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709), the National Environmental Policy Act and the Council on Environmental Quality's regulations for implementing NEPA (40 CFR Parts 1500-1508).

The Ashburton Avenue Master Plan recommends the widening of Ashburton Avenue from its existing width of 36 to 39 feet with 7 to 8 foot wide sidewalks to a general street width of 50 feet and 15 foot wide sidewalks. The Master Plan also proposes approximately 800 new housing units, which includes the Mulford Garden HOPE VI plan and makes recommendations for improving parking on the Ashburton Avenue corridor, and refurbishing park facilities. The Ashburton Avenue Urban Renewal Plan recommends city-initiated actions such as identifying and removing blighted conditions, relocating affected households and businesses, encouraging private investment, redeveloping cleared sites, and creating new opportunities for residents. These Plans fall into the federal purview because the Department of Housing and Urban Development funds the HOPE VI neighborhood grants.

The FEIS takes a "tiered" approach to analyzing the above listed actions. The analysis of the Ashburton Avenue Master Plan and Urban Renewal Plan consists of a broad or generic discussion of the potential impacts resulting from the adoption of the two planning documents. The analysis of the Mulford Gardens HOPE VI Revitalization Plan, which could be considered a subset of the Ashburton Avenue Plans, tiers off the generic analysis of the Master Plan and Urban Renewal Plan and is more detailed. The Mulford Gardens HOPE VI Revitalization Plan includes a major portion of the land in the Urban Renewal Area.

While the FEIS addresses most of our concerns, the General Conformity (GC) Analysis must provide more information prior to its inclusion in the Record of Decision. The following items must be addressed:

Internet Address (URL) • <http://www.epa.gov>

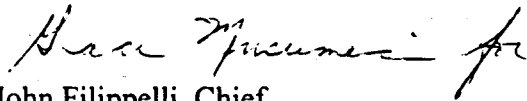
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Postconsumer, Process Chlorine Free Recycled Paper

- Westchester County is included in the NY-NJ-CT PM 2.5 nonattainment area, therefore, a PM 2.5 analysis must be conducted. Note that there currently no de minimis levels established for PM 2.5. Please see webpage <http://www.epa.gov/oar/oaqps/greenbk/qindex.html>, for further information.
- The GC analysis must include emissions from demolition, excavation and construction, in addition to the operating emissions. Depending on the types of diesel equipment used for these activities, the emissions may exceed an annual threshold.
- All assumptions, model inputs, and other data used in the calculations should be included in the GC documentation.
- The analysis must be performed for all applicable years specified in 40 CFR 93.159(d).

Even if project emissions do not exceed the regulatory levels, you may want to consider utilizing the pollution reduction methods for on- and off- road vehicles being used by the Metropolitan Transportation Authority (MTA) for the construction of the Lower Manhattan Redevelopment Projects. The Fulton Street Transit Center Construction Environmental Protection Program Report discussing these methods can be found at: <http://www.mta.nyc.ny.us/capconstr/fstc/documents/cepp.pdf> or you may call Mr. Ajay Singh, Chief Environmental and Sustainability Officer for MTA Capital Program Management at 646-252-4398.

Thank you for the opportunity to comment on this project. If you have any questions concerning our comments, please contact Lingard Knutson of my staff at (212) 637-3747.

Sincerely yours,



John Filippelli, Chief  
Strategic Planning and Multi-media Programs Branch